

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JEFFREY MULLEN, ROBERT IRWIN, JUSTIN
CARNAHAN AND THOMAS BENNETT,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

TERRAN ORBITAL OPERATING
CORPORATION f/k/a TERRAN ORBITAL
CORPORATION, MARC BELL, JAMES
LaCHANCE, STRATTON SCLAVOS,
MATTHEW EBY, DANIEL STATON, PHILIP
KRIM, CHRIS HOLLOD, WISDOM LU, BORIS
REVSIN, TOMMY STADLEN, MICHAEL KIM,
TERRAN ORBITAL CORPORATION f/k/a
TAILWIND TWO ACQUISITION CORP. and
TAILWIND TWO SPONSOR LLC,

Defendants.

Case No. 1:23-cv-01394-JMF

Hon. Jesse M. Furman

**NOTICE OF DEFENDANTS' MOTION TO DISMISS
THE SECOND AMENDED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the Second Amended Class Action Complaint, the Declaration of Jessica Benvenisty in Support of Defendants' Motion to Dismiss the Second Amended Class Action Complaint dated December 18, 2023, and the exhibits thereto, Defendants will move this Court for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing the Second Amended Class Action Complaint for failure to state a claim upon which relief may be granted.

Dated: December 18, 2023

/s/ Jessica Benvenisty

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